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November 10, 2023

VIA ECF

The Honorable Lorna G. Schofield
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: McKoy, et al. v. The Trump Corp., et al., No. 18 Civ. 9936 (LGS) (SLC)

Dear Judge Schofield:

We write on behalf of Plaintiffs in the above-referenced action. On November 3, 2023, the Court directed Plaintiffs to file revised redactions of the filings identified on Page 3 of Plaintiffs' November 2, 2023 letter to the Court. ECF 648; ECF 649. Pursuant to that order, attached are revised redacted versions of the following exhibits:

- Exhibit 1 to the Declaration of Matthew D. Brinkerhoff in Support of Plaintiffs' Motion to Certify Class. ECF 534-1 (sealed); ECF 533-1 (public).
- Exhibit 5 to the Declaration of Christopher R. Le Coney in Support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. ECF 609-5 (sealed); ECF 608-5 (public).
- Exhibit 7 to the Declaration of Christopher R. Le Coney in Support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. ECF 609-7 (sealed); ECF 608-7 (public).
- Exhibit 8 to the Declaration of Christopher R. Le Coney in Support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. ECF 609-8 (sealed); ECF 608-8 (public).
- Exhibit 10 to the Declaration of Christopher R. Le Coney in Support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. ECF 609-10 (sealed); ECF 608-10 (public).
- Exhibit 11 to the Declaration of Christopher R. Le Coney in Support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. ECF 609-11 (sealed); ECF 608-11 (public).

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Although Plaintiffs' November 2, 2023 letter identified ECF 534-23 as partially de-designated, our review did not reveal any confidential information in that filing, which can be unsealed in its entirety.

As for revised redactions for Plaintiffs' class certification and summary judgment briefs, ECF 531, 532, 561, 562, 602, 603, 604, 605, 606, 607, Plaintiffs are refiling those briefs as linked to the original corresponding motions.

Respectfully submitted,



John C. Quinn

cc: *All Counsel of Record (via ECF)*